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July 1, 2011

Mr. Mark Leary
Acting Director
California Resources and Recycling
1001 I Street
Sacramento, CA 95812

Re: Comments on the 2011 LEA-Approved Permit for the Proposed Gregory Canyon Landfill (No. 37-AA-0032)

Dear Mr. Leary:

These comments are provided on behalf of the Pala Band of Mission Indians ("Pala Band") to urge CalRecyle to object to the solid waste facility permit ("SWFP") for the proposed Gregory Canyon Landfill approved by the San Diego County of Environmental Health acting as the local enforcement agency ("LEA"). The SWFP was forwarded to the CalRecycle in April.

The Pala Band has strongly opposed issuance of an SWFP for the proposed landfill for a number of years. And though changes have been made to the proposed project over that period, the proposed landfill still would destroy undeveloped Gregory Canyon, threaten the San Luis Rey River and the aquifers that supply water for local residents and downstream municipalities, including the City of Oceanside, and desecrate Gregory Mountain (Chok'la) and Medicine Rock, two sites considered sacred by Native Americans. The proposed landfill also would destroy critical habitat for endangered and sensitive species, result in the "take" of those species, and generate severe traffic and safety problems along the narrow, winding and already heavily utilized State Route 76 ("SR 76"). Placing the proposed landfill in this rural area also would destroy the aesthetic appeal of the Gregory Canyon area.

Given these impacts and the significant and unmitigable impacts of the proposed project identified in the Final Environmental Impact Report ("FEIR") and the Revised FEIR (collectively, the "RFEIR"), there are no overriding considerations which support its approval. That is why the project is opposed by all 19 Native American Tribes in San Diego County, numerous other Tribes throughout the state, municipalities, environmental and health groups such as the Natural Resources Defense Council, RiverWatch, the Sierra Club, the Environmental Health Coalition, and Surfrider, and numerous other entities and individuals.

1. The LEA-Approved, Four-Page Permit Does Not Satisfy State Requirements.

1. The "Total Permitted Site" Should Include the Entire Area.

The approved permit defines the "total permitted site" as being 308 acres. That appears to include the proposed landfill footprint, the facility area, the desilting basins, the bridge and access road and the borrow pits, but not numerous other areas on the site where activities described in the RFEIR and the JTD would occur. As those documents are incorporated in the permit and establish specific requirements for those other areas, all of the site must be included. (1)

For example, activities in the "temporary" construction yard must comply with mitigation measures in the RFEIR, a requirement that is contained in Condition 17.j. Likewise, a groundwater production well has been proposed on the north side of State Route 76 outside this area, buildings will be demolished on the site, areas outside the 308 acres are required to be landscaped, mitigation areas are required to be created and open space must be preserved. As these activities all are required by the permit, the LEA has the obligation to ensure that they are conducted in accordance with the terms of the permit, and the total permitted site should include the entire 1783 acres.

2. The Approved Permit Improperly Allows the Maximum Depth of the Proposed Landfill To Exceed the Depth of the Excavation Identified in the FEIR.

The 2004 permit approved by the LEA stated that the maximum depth of the excavation for the proposed landfill would be to 525 feet mean sea level ("MSL"). In contrast, the 2011 permit states that the maximum depth of the excavation would be 380 feet MSL, a difference of 145 feet.

The project initially was to be excavated to a depth of 370 MSL, which would have placed the bottom of the proposed landfill below the piezometric level of groundwater. Based on comments from the Regional Board, the FEIR included an alternative design with a maximum depth of 400 MSL to allegedly ensure that the bottom was above the highest anticipated level of groundwater. As the RFEIR is incorporated into the permit, the 380 feet stated is in conflict with the permitted depth of the excavation. (2)

While the LEA's CEQA Findings claim that increasing the depth to 380 feet would be "inconsequential," there is no evidence that an excavation to that depth would not place a portion of the proposed landfill below the piezometric level of groundwater. Because the JTD does not confirm that the bottom of the proposed landfill would remain five feet above the highest anticipated groundwater level as required by law, the LEA-approved design is not legally defensible. This is an example of why the JTD is not complete and correct. CalRecycle cannot

concur with the permit until that issue has been resolved and the JTD is complete and correct. (27 C.C.R. § 21685(b)(1).)[1] (2)

3. The Impacts on the Stability of the Proposed Landfill By Increasing the Slope of the Excavation Must Be Analyzed Before the Permit Can be Approved.

Not only has depth of the excavation at the northern (downgradient) area of the proposed landfill been increased by at least 20 feet, but Item 18 in Table 1 of the LEA's Findings states that the project also has been redesigned to decrease the excavation in the southern (higher end) of the canyon to 925 feet from 700 feet MSL, a decrease of 225 feet. That change is not reflected in the JTD, which states at Appendix B-2 that the depth of the excavation would be between 380 and 750 feet. This is another example of why the JTD is not complete and correct and another instance where the permit fails to clearly identify the project that is being approved. (3)

Using the project described in the LEA's Findings, the slope of the excavation would increase significantly over the entire length of the liner. Assuming the bottom of the excavation would be 5000 feet long, the slope would increase nearly 100% from approximately 6% (300 foot rise) to nearly 11% (540 foot rise). Even so, the JTD fails to include an evaluation of whether this significant change in slope would impact the stability of (1) the bottom liner and the leachate control and recovery system ("LCRS") and (2) the pile of disposed waste that would sit on top of the liner and the operations layer. The JTD also does not include an analysis of the day-to-day stability of the liner and the waste slopes, and critically of their stability in a seismic or other dynamic. Without that analysis the JTD is not complete and correct and CalRecycle cannot satisfy the requirement that it "promote the health, safety and welfare of the people of the State of California" and "protect the environment" and thus it cannot concur in the issuance of the permit. (27 C.C.R. § 20050.)

4. The Availability of Sufficient Cover Material Must Be Confirmed Before a Permit Can Be Issued.

(4)

The change in design of the excavation also raises new questions about the availability of cover material for the proposed landfill. The amount of material that would be excavated always has been a moving target, and the JTD still has not clarified the issue.

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[1] For the JTD to be correct, "all information provided by the applicant regarding the solid waste facility must be accurate, exact, and must fully describe the parameters of the solid waste facility" and must be supplied "in adequate detail to permit thorough evaluation of the environmental effects of the facility and to permit estimation of the likelihood that the facility will be able to conform to the standards over the useful economic life of the facility." (27 C.C.R. §§ 21563(d)(2) and 21570(d).) That standard has not been met. The Pala Band also incorporates by reference all the comments it provided to the California Integrated Waste Management Board in December of 2004 identifying deficiencies in the JTD.

The chart in Appendix B-2 of the JTD states that 9.8 mcy would have been excavated if the proposed project analyzed in the FEIR had been selected and that 7.9 mcy would be excavated to construct the project described in the JTD. Again, the project described in the JTD as identified at the bottom of the chart would have a depth of between 380 and 750 feet. The chart does not state what amount of material would be excavated if the FEIR "Alternative" project was constructed.

But the 7.9 mcy that the JTD chart claims would be excavated conflicts with the discussion on page 6-76 of the FEIR, which states that the amount excavated to build the "Alternative" project would be approximately 3.5 mcy less than the 9.8 mcy excavated to construct the project initially proposed in the FEIR. That means that the Alternative project would require that 6.3 mcy be excavated. The JTD does not explain why the project it describes would result in 1.6 mcy more excavated material than the Alternative project described in the FEIR, which was the project selected. (4)

The JTD also does not indicate how much material would be excavated if the depth of the southern excavation was raised 175 feet to 925 feet as stated in the LEA Findings. If the amount of excavated material would stay the same, a large portion of the northern end of the excavation would have to be deepened to make up the amount lost. But the JTD does not resolve that issue. Consequently, there is no evidence to support the claim in the JTD about the amount of material that would be excavated for the project it describes, let alone for the 925-foot project it never discusses. The JTD is not complete and correct on this issue.

Without clear understanding of the amount of material that would be excavated, it is not clear that there would be sufficient material for daily operations as well as construction and closure, no matter what waste to cover ratio is assumed. We note that the permit documents claim that less green waste will be used as ADC, making it more unclear as to how the 7.5:1 ratio would be achieved. Given these deficiencies in the JTD, CalRecycle cannot concur with the permit.

5. The Permit Should Not Be Approved Until the Issue of Fire Service Has Been Resolved.

The location of the proposed landfill is in a very high fire hazard risk area as determined by CalFire. The area also has no water service, but will get water by pumping it or by trucking it 90 miles from El Monte in east Los Angeles. While a fire that might start in the proposed landfill or threaten it from the outside could be catastrophic in a Santa Ana wind condition, the permit puts off addressing this issue. Instead, the permit simply requires the applicant to "commit" to participating in a "Community Facility District" or a "Developer Agreement" to address fire service. (5)

Not only must this issue be resolved before a permit is issued, but the requirement to "commit" to one of these options is ambiguous. What does it mean to "commit" and who would the commitment be made to? What is the deadline for "committing"? Again, this kick-the-can-down-the road approach to addressing this very serious issue is improper and the permit should not be approved until it is resolved. Approval of this project without adequate fire protection

could raise serious liability issues for the state of California and would not satisfy the requirement that CalRecycle "promote the health, safety and welfare of the people of the State of California." (27 C.C.R. § 20050.)

(5)

The permit also improperly identifies the requirement to maintain the required flammable clearance as Finding 13.e. That requirement should be a condition of the permit, not a finding because there is no evidence of compliance with the requirement.

6. The Permit Cannot Allow the Proposed Landfill to Accept Designated or Hazardous Waste

Section 14, "Prohibitions" prohibits the acceptance of designated or hazardous wastes except for those wastes listed and if the acceptance "is authorized by all applicable permits." But the permit must prohibit the acceptance of any designated or hazardous waste whether or the waste is listed in the permit (as, for example, agricultural waste and industrial waste). State law prohibits the disposal of designated waste at this proposed landfill (27 C.C.R. § 20210) and state and federal law prohibit the disposal of hazardous waste at the proposed landfill. The language in the permit is ambiguous and must be revised to make those requirements clear.

(6)

7. The Permit Should Be Conditioned By All Required Approvals, Not Simply By the Waste Discharge Requirements ("WDRs")

Section 15 refers to the "pending" WDRs as also describing the operation of the facility. But the operations at the facility also would be described by a number of other permits and approvals, including the air quality permit, the Section 404 fill permit from the Corps, the Section 401 water quality certification, and Proposition C, to name a few. All of these other operating documents should be referenced and it made clear that those approvals preempt any conflicting requirements in the RFEIR.

(7)

8. The Section Describing Self-Monitoring Reports Fails to Identify All the Necessary Reports.

The 2004 permit included a list of reports that needed to be submitted of which a few are referenced in the 2011 permit. The reporting requirements listed in the 2004 permit should be reflected here as well. For example, there should be a specific requirement to report on the application and results of the hazardous waste exclusion program.

(8)

In addition, even those few requirements that are stated are perfunctory. Whereas the 2004 permit required the operator to maintain records "of the types and quantities (in tons) of waste, including separated or commingled recyclables, entering the facility per day," the 2011 permit states that the operator "shall maintain, and keep current, all records used to determine daily tonnage." That requirement is not clear and how these records are to be reported to the LEA is not stated.

Similarly, the 2011 permit requires the operator to maintain a daily record "of al vehicles using the facility." But the traffic records should reflect all vehicles entering facility and must

indicate if vehicles were prevented from entering because the permit vehicle limits had been met. Again, the permit does not make clear what is required to be in the report submitted to the LEA.

Finally, the landfill gas monitoring report requirements fail to clarify what information must be included in the report. The permit must refer to the requirements in 27 C.C.R. §§ 20934 and 20937, and the permit should require that the report list the concentrations of trace gases and the permit should identify which trace gases should be analyzed. (8)

For all these reasons, the permit should be rejected until it is written in a clear and comprehensive manner in accordance with law.

9. The Conditions in the Permit Are Improper and/or Ambiguous

a. Condition 17.a

This condition states that the hours of operation listed in the JTD may be altered by approval of the LEA. While those hours may be decreased, they cannot be expanded or changed to be in conflict with Proposition C, which established the hours of operation. The LEA has no authority to change those requirements as Proposition C explicitly states that it may be amended only by a vote of the people. (9)

b. Condition 17.c

This condition simply repeats the requirement to submit a report describing remaining capacity and should be deleted. (10)

c. Condition 17.d

The provision fails to state who will conduct the inspections (presumably the LEA) and the phrase "waste disposition activities" makes no sense. Does that mean that an inspection can only occur before the first waste is disposed and after closure? The permit should state that inspections can happen any day of the week and any time of the day, including before or after hours of operation. (11)

d. Condition 17.g

This is another permit condition that sets up the LEA for disputes over what is required under the permit. The provision requires compliance with the MMRP "and all other mitigation measures and project design features included as attachments to the permit application or described in the JTD." But it is not clear what these "attachments" are and no assurance that they do not conflict with the MMRP or the JTD. Further description of these requirements is needed to make the obligations of the permittee and the LEA clear and the permit should not be approved until those revisions are made. (12)

This condition also allows the permittee to propose changes to the mitigation measures, but fails to make clear that such changes can only be approved by the LEA if the mitigation measure is shown to be infeasible. (*Napa Citizens for Honest Government v. Napa County Board*

of Supervisors (2001) 91 Cal.App.342, 359.) Deleting an approved mitigation, even if a new measure is inserted, cannot simply be accomplished through the CalRecycle revision/modification analysis, and the permit should make that clear. (12)

e. Condition 17.h

The requirement to establish this interim committee is mere window dressing and it is not clear what authority the LEA has to impose the requirement and what would happen to the permittee if it was violated. The reference to the Proposition C requirement in this provision is further evidence that the Proposition C should be identified in Section 15. (13)

f. Condition k

The LEA's revision to MM 4.5-5 shows that the original mitigation was illusory and this new condition is ambiguous and potentially unenforceable. When does CalTrans' inaction become untimely so as to trigger compliance and how would an alternate construction project address the impacts of the proposed landfill? (14)

g. Condition l

Again, it is not clear that the permittee has any obligation to comply with this condition unless the projects would mitigate impacts of the proposed project. Nothing limits CalTrans from simply ignoring the condition imposed in this permit. (15)

10. The Permit Must Include Other Requirements.

Because the JTD or other documents fail to include specific requirements or fail to identify when specific requirements must be satisfied, the permit is incomplete.

a. Completion of Improvements to SR 76

The JTD states that the project "includes some modifications to improve site distance and to facilitate truck movement on Pala Road (SR 76) near the access road entrance." No further discussion of these modifications is provided, although Proposition C requires the permit applicant to provide "detailed plans for the realignment of Highway 76" to provide approximately 1000 feet of site distance in both directions for traffic leaving the landfill and for widening the road to allow deceleration and acceleration lanes. As these are required elements of the project pursuant to Proposition C, they should be part of the JTD, and detailed drawings approved by CalTrans must be provided for the JTD to be complete and correct. In addition, the permit must clarify that these improvement are required to be completed before any operations can begin. (16)

b. The Permit Must Limit the Source of Waste to North County

The proponents of Proposition C promised voters that this landfill would be for North County waste only and specifically prohibits the facility from receiving waste from any area of the county except the north county. Section 2.K explicitly states that "solid waste shall not be (17)

shipped from one sub-region to any other sub-region except where an emergency exists." That requirement must be reflected in the permit.

In addition, in opposing Proposition B, the project proponents (who drafted Proposition C) and was the permittee at that time, told voters that voting no on Proposition B (and keeping Proposition C) would prohibit Los Angeles from bringing its trash to San Diego County. (See attached flyer.) That interpretation confirmed that the intent of the voters in passing Proposition C was to prohibit the import of waste from outside the county, and that requirement also must be reflected in the permit for the proposed landfill. (17)

II. The Statement of Overriding Considerations ("SOC") Does Not Provide Sufficient Reason to Approve the Landfill Project Given the Significant and Unmitigable Impacts That it Would Cause.

While the LEA has issued Findings and Revised Findings and a Statement of Overriding Considerations ("SOC") under CEQA, as a "responsible agency," CalRecycle has an independent obligation to make its own findings and to issue an SOC if appropriate. (CEQA Guidelines § 15096(h).) Under CEQA, a responsible agency cannot approve a project unless it first finds that there are no feasible mitigation measures or alternatives "that would substantially lessen or avoid any significant effect the project would have on the environment." (Public Resources Code § 21081(a); 14 C.C.R. § 15096(g)(2)). Only if it finds that mitigation measures or alternatives that would reduce these impacts are infeasible can the agency then determine that substantial evidence supports overriding considerations that allow a project to proceed notwithstanding these impacts. (*County of San Diego v. Grossmont-Cuyamaca Community College District* (2006) 141 Cal.App.4th 86, 100.) Given its independent obligation to make these findings, CalRecycle should not simply rely on the LEA's inadequate findings and SOC. (18)

The obligation to make findings has been triggered because the RFEIR concluded that its construction and operation would cause significant but unmitigable impacts in five areas: traffic and circulation, noise and vibration, air quality, ethnohistory and Native American Interests, and aesthetics. For each of these impacts, CalRecycle must make findings that mitigating the impacts is infeasible.

The first problem with blindly following the LEA's lead is that the LEA simply reused the Findings it had issued in 2004 to support the previous permit it issued. However, those Findings were rescinded by the LEA Director in February of 2006 to comply with the writ of mandate issued by the superior court after it concluded that the FEIR was inadequate. As the LEA did with the rescinded permit, it apparently has taken the position that the earlier Findings also remain valid even though they were rescinded. CalRecycle should not take the same indefensible position.

A second problem is that neither the Findings nor the Revised Findings include substantial evidence that it would be infeasible to impose specific mitigation measures that would mitigate identified significant impacts. This is especially true for impacts to traffic and to air quality, and for impacts caused by noise. The LEA's statements that these impacts cannot be mitigated are conclusory or dated.

The claimed benefits described in the SOC and in the SSOC are not supported by substantial evidence in the record, and do not individually or collectively override the significant impacts of the project. Because the "primary consideration" in issuing an SWFP must be "protecting public health and safety and preventing environmental damage" and "protection of the environment is the guiding criterion"(Pub. Res. Code § 44012), there must be some clearly defined, supportable benefit to issuing an SWFP. In this case, the modest benefits that have been identified are insufficient to override this legislative mandate. (18)

1. Providing Additional Disposal Capacity is not a Valid Overriding Consideration for the Impacts of the Project.

The first "overriding considerations" claims that the proposed landfill would provide additional landfill capacity for the County. But the permit does not limit the facility from accepting out-of-county wastes, so there is no evidence that the project's capacity would be reserved for the county at large or for the "North County" area specifically. If a condition is included in the permit prohibiting the proposed landfill from accepting waste from another county in the state (it still could accept waste from other states and thus not violate the Commerce Clause) there might be evidence that it will provide the claimed additional capacity. (19)

In addition, the capacity is not needed to ensure that the County has adequate capacity as identified in the County's 2011 Update to its Siting Element. Thus, the mere provision of additional capacity is not an adequate overriding consideration.

2. Implementing Policies in the Siting Element is Insufficient.

Similarly, merely claiming that policies in the Siting Element might be implemented is speculative and does not provide a sufficient basis for overriding the significant impacts of the proposed project. In fact, building another landfill violates the policy to reduce waste disposal and to maximize the efficient and economic use of existing facilities. The minor benefits claimed fail to override the significant impacts. (20)

3. Adding Landfill Capacity in the North County is Not an Overriding Consideration.

While that statement may be geographically true, there is no basis for claiming that the location of the proposed landfill provides any benefit that overrides the severe consequences of its construction. Again, there is no assurance that all or any of the waste generated in the ambiguous "North County" area would be disposed at the proposed landfill, and no prohibition on the importation of waste from out of the county that would limit its use any north county generators. (21)

4. There is no Evidence That the Project Would Reduce Greenhouse Gas ("GHG") Emissions or Produce Alternative Energy. (22)

The claim that the proposed project would reduce GHG emissions is not supported by any evidence since the LEA refused to conduct an analysis of the GHG emissions from the

proposed landfill. In addition, as the source of the waste for the project is not limited, there is no evidence to support claims that the project would reduce the mileage needed to dispose of waste.

(22)

In addition the claim that the project would produce alternative energy is speculative and has never been discussed previously. If this proposed landfill is as efficient as advertised, it is not clear that sufficient gas would be generated to support an alternative energy source anyway.

5. The Claimed Benefits of the Liner Design Are Speculative at Best.

(23)

The notion that the installation of the proposed liner on approximately 20% of the footprint would "set a new and higher standard for other landfill liners" is pure speculation because there is no reason to believe that other proposed landfills would be approved in a steep canyon next to a river and adjacent to drinking water aquifers. There also is no evidence that it would increase knowledge regarding liner design performance.

6. The Claimed Contribution to CalTrans Cannot be Enforced.

(24)

The claim that the applicant would pay CalTrans one million dollars for safety improvements "in the vicinity of the landfill" is speculative and the applicant could simply argue that the LEA has no authority to impose such a condition. Since the money (if paid) would be spent at the discretion of CalTrans, there also is no evidence that it ever would be spent on improvements to SR 76 not otherwise required to be completed by proposition C. This promise does not override the significant impacts of the project.

7. Providing Open Space as Required by Prop C is a Permit Condition Not an Overriding Consideration.

(25)

The open space required to be set aside by Proposition C is a permit requirement and cannot be used as an overriding consideration.

10. Offers of Increased Mitigation Do Not Override the Impacts.

(26)

The mitigation for impacts to biological resources is required by the RFEIR and the permit and cannot be considered an overriding consideration, even if the LEA and the applicant claim the mitigation is more than is required.

11. The Project is Not Consistent With the Draft MSCP or the River Park.

(27)

The idea that placing a solid waste landfill in an area slated to be a pre-approved mitigation area is consistent with the MSCP has no basis in reality. Even though mitigation would be required, the presence of the project alone would disrupt any continuity claimed in this overriding consideration. Likewise, the idea that placing a landfill along the river somehow enhances the river park concept is ludicrous and an example of the LEA proposing any sort or "benefit" to support its claim that there are overriding considerations that support the proposed project..

III. Conclusion

For all the reasons provided above and in previous proceedings, the Pala Band urges CalRecycle to object to the permit as approved. We appreciate CalRecycle's consideration of the issues identified above.

Sincerely,

Walter E. Rusinek

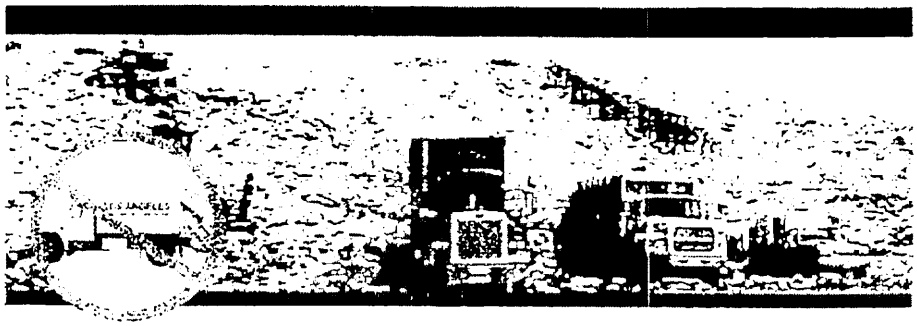
WER:mkk

cc: Robert H. Smith, Chairman, Pala Band of Mission Indians
Shasta Gaughen, Director, Pala Environmental Department
Damon Nagami, Esq., NRDC
Pamela Epstein, Esq., Sierra Club
Everett L. DeLano III, Esq., RiverWatch

DON'T LET L.A. DUMP ITS TRASH IN SAN DIEGO.

VOTE NO ON PROPOSITION B

NO ON B



Say No To L.A. Trash. Vote No On Prop B.

NO on B tells Los Angeles to keep its trash in Los Angeles.

NO on B keeps strict Consumer and Environmental Safeguards in place. If Prop. B passes, the safeguards will be overturned.

NO on B protects a public vote. In 1994, the public voted 68% to impose the strictest environmental safeguards in the country on a new north county landfill.

NO on B guarantees that California's Regional Water Board, Dept of Environmental Health, and Integrated Waste Management Board can review and impose the strictest controls in the nation.

NO on B
330 Encinitas Blvd., Suite 101
Encinitas, CA 92024-3723

No on B is supported by a broad coalition of scientists, water quality experts, consumer, taxpayer and business organizations, and Democrats and Republicans:

- The San Diego Taxpayers Association
- The San Diego Regional Chamber of Commerce
- The La Jolla Democratic Club
- Dianne Jacob, San Diego County Supervisor, District 2
- Lucy Killea, California State Senate (Ret.)
- Judy McCarty, San Diego City Council (Ret.); Founder City of San Diego's Recycling Program
- Mary Salas, Deputy Mayor, City of Chula Vista
- Professor Robert L. Simmons, Professor of Law, University of San Diego (Ret.); Past Member, San Diego Chapter Sierra Club Executive Committee; Environmental Attorney
- Howard Wayne, California State Assembly (Ret.)
- Michael Shames, Executive Director, UCAN The Utility Consumers' Action Network
- Lamar G. Burton, M.D., Mayor of San Marcos (Ret.); Past President, Vallecitos Water District
- Patti Krebs, Executive Director, Industrial Environmental Association
- Phil Monroe, Coronado City Council Member
- San Marcos Chamber of Commerce
- Everone Schutte, Former President, San Diego Community College Board
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- Mike Rogers
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- Deborah Berger
- Samantha Seaman

(partial list)